

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re

SONIA M. ACEVEDO MARRERO  
Debtor

MARGARITA ROSADO MUÑOZ,  
GABRIEL ROSADO MUÑOZ and DAVID  
ROSADO NUÑEZ  
Movants

vs

SONIA M. ACEVEDO MARRERO  
Respondent

CASE NO. 10-11522 BKT

Chapter 11

**OPPOSITION TO MOTIONS TO STRIKE EXHIBITS  
(Dkts. 19, 20)**

TO THE HONORABLE COURT:

COME NOW parties-in-interest MARGARITA ROSADO MUÑOZ, GABRIEL ROSADO MUÑOZ and DAVID ROSADO NUÑEZ through the undersigned attorneys and very respectfully STATE and PRAY:

1. On December 22, 2020 DEBTOR filed two motions to strike (Dkts. 19, 20) the exhibits submitted by the appearing parties in the Spanish language in support to their motions filed on 12/15/10. (MOTION TO DISMISS THE BANKRUPTCY PETITION FOR LACK OF GOOD FAITH, Docket No. 8; and MOTION FOR RELIEF FROM STAY, Docket No. 9). Both motions have been scheduled for a hearing to be held on January 11, 2011 at 9:00 am. See also MOTION SUBMITTING EXHIBITS. Dkt. 17.

2. The appearing parties hereby oppose said motions to strike, upon the following grounds.

3. The motions to strike simply state that the motions have been scheduled for a hearing

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to be held on January 11, 2011, and that we have sought leave to submit the translations at a date falling after the said hearing date.

4. We respectfully submit that the honorable court has discretion to allow documents in the Spanish language, as long as a certified translation is submitted at a later date.

5. Understanding the documents in the Spanish language at this time (or at the hearing) poses no problem to the court, the debtor, or her attorney.

6. The need to translate is only justified for post-judgment appellate procedures.

7. In any event we respectfully represent to the court that – should it so rule – the exhibits to be submitted into evidence shall be accompanied by certified translations. We are merely attempting to minimize cost, avoiding the additional expense of an expedited translation.

**WHEREFORE**, it is respectfully requested that the Honorable Court :

- A. DENY the motions to strike (Dkts. 19, 20);
- B. that the appearing parties be allowed to submit certified English translations within the time requested in (Dkt. 17); and/or
- C. in the alternative, should the foregoing extension is not granted, that the appearing parties be allowed to submit certified English translations of the exhibits at the hearing of January 11, 2011.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties appearing in said system.

In San Juan, Puerto Rico, this 23rd day of December, 2010.

EDGARDO MUÑOZ, PSC  
*Attorney for parties-in-interest* Margarita  
Rosado Muñoz, Gabriel Rosado Muñoz and

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s/ **EDGARDO MUÑOZ**  
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